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7 Attorneys for Defendant
8 JASON EDWARD THOMAS CARDIFF

9
10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 JASON EDWARD THOMAS
16 CARDIFF,

17 Defendant.

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S UNOPPOSED
EX PARTE APPLICATION FOR
PERMISSION TO TEMPORARILY
RELOCATE TO DALLAS**

*[Filed concurrently with Declaration of
Stephen G. Larson and [Proposed]
Order]*

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EX PARTE APPLICATION

By and through counsel of record, Jason Cardiff hereby seeks permission to temporarily relocate to Dallas, Texas from now until July 12, 2024, or until electricity is restored to Mr. Cardiff's place of residence, whichever is later, in the aftermath of Hurricane Beryl.

7 Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the
8 amount of \$500,000 with full deeding of real property. His release conditions
9 include, among other conditions: a travel restriction to the Central District of
10 California and the Southern District of Texas; a curfew between the hours of 8:00
11 p.m. and 8:00 a.m.; and, placement in the custody of third-party custodian, Attorney
12 Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties
13 in support of the bond. Ms. Murphy also deeded her home as collateral.

14 Mr. Cardiff has been living with Attorney Cochell in Kingwood, Texas, and
15 he is being supervised by United States Probation Officer Jack Sherrod of the
16 Southern District of Texas.

17 On July 8, 2024, Hurricane Beryl struck Texas, leaving millions of Houston
18 residents without electricity during surging summer temperatures. On July 9,
19 United States Probation and Pretrial Services Officer Kathleen Torres-Vasquez
20 approved Mr. Cardiff's emergency relocation to Dallas, and Mr. Cardiff left
21 Houston for Dallas with his third-party custodian. Officer Torres-Vasquez indicated
22 that Mr. Cardiff had approval to remain in Dallas until July 12, 2024, or until
23 electricity is restored to Mr. Cardiff's place of residence, whichever is later, and that
24 counsel should file the instant *ex parte* application seeking court permission for the
25 same.

26 || Sureties Lilia Murphy and Brian Kennedy do not oppose this request.

27 Assistant United States Attorney Valerie Makarewicz indicated that the
28 government does not oppose this request.

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2 Dated: July 10, 2024

LARSON LLP

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By: /s/ Stephen G. Larson

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Stephen G. Larson

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Hilary Potashner

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Jonathan Gershon

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Attorneys for Defendant

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JASON EDWARD THOMAS CARDIFF

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